

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	<b>CIVIL ACTION NO. 04CV11024 RWZ</b>
<b>JEANNE DEGAN,</b>	)	
<b>Plaintiff,</b>	)	<b>Jonathan R. Sigel</b>
	)	<b>BBO# 559850</b>
<b>v.</b>	)	
	)	
<b>GOLDWELL OF NEW</b>	)	
<b>ENGLAND, INC.,</b>	)	
<b>Defendant.</b>	)	
_____	)	

**ASSENTED TO MOTION TO EXTEND TIME**  
**TO RESPOND TO PLAINTIFF'S MOTION**

Pursuant to Rule 7.1(b)(2) of the Local Rules of the United States District Court for the District of Massachusetts, Defendant Goldwell of New England, Inc. ("Goldwell" or "the Company") respectfully requests a two (2) week extension of time within which to oppose or otherwise respond to Plaintiff's Motion to Amend Complaint and/or Amended Complaint. As grounds for its *assented to* motion, Goldwell states as follows:

1. On March 14, 2005, Plaintiff filed a Motion to Amend Complaint and First Amended Complaint.
2. Defendant requires additional time to oppose or otherwise respond adequately to Plaintiff's Motion and/or Amended Complaint.
3. On March 23, 2005 undersigned counsel requested and received assent from Plaintiff's counsel for a two (2) week extension of time to April 11, 2005 to file a response to Plaintiff's Motion and/or Amended Complaint. Plaintiff will not be prejudiced by such extension of time.

WHEREFORE, Defendant respectfully requests a two (2) week extension of time to April 11, 2005 in which to oppose or otherwise respond to Plaintiff's Motion to Amend and/or Amended Complaint.

**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

The undersigned asserts that he has conferred with counsel for Plaintiff in a good faith effort to resolve the instant motion. Plaintiff's counsel has assented to the motion.

GOLDWELL OF NEW ENGLAND, INC.

By its attorneys,

A handwritten signature in black ink, appearing to read 'Jonathan R. Sigel', is written over a horizontal line.

Jonathan R. Sigel, BBO# 559850

Renee E. Hackett, BBO# 640841

Bowditch & Dewey, LLP

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Dated: March 29, 2005